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March 24, 2016

**VIA ECF**

Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Trevon Gross*, 15-cr-769 (AJN)

Dear Judge Nathan:

We represent Defendant Trevon Gross in the above-captioned matter. On March 3, 2016, Mr. Gross was released on a \$100,000 personal recognizance bond under the supervision of Pretrial Services. Pretrial Services has determined that electronic reporting is appropriate for Mr. Gross. Therefore, we respectfully request that Mr. Gross's conditions of release be modified to specify that he is permitted to report electronically. The Government and Pretrial Services have no objection to this request.

An additional condition of Mr. Gross's release was that he surrender his firearms. Mr. Gross fully complied with this condition on March 4, 2016. However, Pretrial Services has asked that he also surrender his firearms identification card so that he is not in a position to obtain any additional firearms. Mr. Gross has no objection to this request, but Pretrial Services has requested that the conditions of release be modified to permit them to take possession of his firearms identification card. We therefore respectfully request that the conditions of his release be modified to require Mr. Gross to surrender his firearms identification card to Pretrial Services.

We are happy to answer any of the Court's questions or address any concerns. Thank you for your attention to this matter.

Respectfully submitted,

s/ Kristen M. Santillo  
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cc: AUSA Daniel Noble  
AUSA Eun Young Choi  
Officer Bernisa Mejia, Pretrial Services